

# **Exhibit 6**

# Exhibit A

**COHEN  
WEISS  
AND  
SIMON**  
October 2, 2013<sup>LP</sup>

Thomas N. Ciantra, Partner  
Tel: 212.356.0228  
Fax: 646.473.8228  
Cell: 917.748.9423  
tciantra@cwsny.com  
[www.cwsny.com](http://www.cwsny.com)

330 West 42nd Street • New York, NY 10036-6979

By E-mail

Bruce Bennett, Esq.  
Jones Day  
555 South Flower Street, 50<sup>th</sup> Floor  
Los Angeles, California 90071

Re: In re City of Detroit

Dear Mr. Bennett:

Pursuant to Local Rule 7.1 of the U.S. District Court for the Eastern District of Michigan and Local Bankruptcy Rule 9014-1(g), I write to advise that International Union, United Automobile Workers (“UAW”) intends to file a motion to compel discovery of certain documents identified on the privilege log accompanying the City of Detroit’s document production and to seek to narrow the potential issues or documents that would be involved in such a motion. Because of the exigent schedule, UAW requests that the City respond to this correspondence by October 7, 2013.

The City has withheld numerous documents under an assertion of a Common Interest privilege with the State of Michigan. In opposition to the motion of Michigan Council 25 of the American Federation of State, County and Municipal Employees, AFL-CIO and Sub-Chapter 98, City of Detroit Retirees’ Motion To Compel Testimony of Kevyn Orr and All Other City and State Witnesses Regarding City-State Communications Prior To July 17, 2013 (the “AFSCME Motion”), the City and the State entered into a common interest agreement “at the time of the appointment of the Emergency Manager” (¶10) and that “pursuant to PA 436, the City, acting through its Emergency Manager, and State share the same legal interest in ‘rectify[ing] the financial emergency’ and ‘assur[ing] the fiscal accountability’ of the City during the Emergency Manager’s term of service.” (¶11).

The September 12, 2013 Common Interest Agreement recites that “on or around the appointment of the Emergency Manager” the City and State entered into a verbal common interest agreement. In its opposition to the AFSCME Motion, the City notes that “Mr. Orr was appointed to the position of “emergency financial manager” for the City by the Local Emergency Financial Assistance Loan Board created under the Emergency Municipal Loan Act, M.C.L. §§ 141.931-141.942, on March 15, 2013, pursuant to Public Act 72 of 1990 of the State of Michigan, also known as the Local Government Fiscal Responsibility Act, M.C.L. §§ 141.1201 141.1291. Mr. Orr formally took office as the emergency financial manager for the City under PA 72 on March 25, 2013.”



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Accordingly, and at a minimum, documents which antedate March 15, 2013, cannot be covered by the common interest privilege with the State that the City has asserted here. Yet, the privilege log produced with the documents identifies a number of documents dated before March 15, 2013, on which common interest privilege is asserted. UAW requests production of these documents, to wit:

PRIV0349	PRIV10606	PRIV7273	PRIV8825	PRIV8923
PRIV0405	PRIV10621	PRIV7274	PRIV8826	PRIV8924
PRIV0484	PRIV10629	PRIV7280	PRIV8841	PRIV8925
PRIV0565	PRIV10645	PRIV7283	PRIV8898	PRIV8926
PRIV10482	PRIV2930	PRIV7284	PRIV8900	PRIV8931
PRIV10483	PRIV2931	PRIV7287	PRIV8901	PRIV9732
PRIV10509	PRIV3401	PRIV7289	PRIV8902	PRIV9733
PRIV10544	PRIV7219	PRIV7571	PRIV8903	PRIV9749
PRIV10556	PRIV7220	PRIV7596	PRIV8904	PRIV9830
PRIV10557	PRIV7232	PRIV8784	PRIV8905	PRIV4959
PRIV10568	PRIV7242	PRIV8823	PRIV8906	
PRIV10592	PRIV7268	PRIV8824	PRIV8910	

Attachment A to this letter are the entries on the City's privilege log for the above items.

In addition, the City has claimed attorney-client privilege for a host of documents to or from Jones Day which antedate Jones Days' retention by the City of Detroit which we understand to have been March 11, 2013. The possible basis for the assertion of privilege in the case of these documents (most of which are dated 2012) is not clear and we would request their production:

PRIV2930	PRIV2931	PRIV5630	PRIV0414	PRIV0411	PRIV0408
PRIV0407	PRIV9749	PRIV0405	PRIV0399	PRIV0400	PRIV0397
PRIV0398	PRIV0395	PRIV9745	PRIV0394	PRIV0386	PRIV0388
PRIV0378	PRIV0380	PRIV0381	PRIV0382	PRIV0383	PRIV9742
PRIV0375	PRIV0376	PRIV0377	PRIV0373	PRIV9739	PRIV9740
PRIV0369	PRIV0370	PRIV0371	PRIV0372	PRIV9738	PRIV0359
PRIV0348	PRIV0349	PRIV0565	PRIV0566	PRIV0344	PRIV0342
PRIV0335	PRIV0340	PRIV0339	PRIV9731	PRIV0333	PRIV5755
PRIV5968	PRIV9726	PRIV0321	PRIV0322	PRIV9719	PRIV9720
PRIV5698	PRIV5710	PRIV0267	PRIV0523	PRIV0524	PRIV5662
PRIV5663	PRIV5664	PRIV5665	PRIV0308	PRIV0310	PRIV5658
PRIV5660	PRIV0521	PRIV0519	PRIV0520	PRIV0517	PRIV0505
PRIV0506	PRIV0507	PRIV0508	PRIV0509	PRIV0511	PRIV0512
PRIV0513	PRIV0514	PRIV5656	PRIV0301	PRIV0302	PRIV0303
PRIV0304	PRIV0305	PRIV0306	PRIV0307	PRIV9692	PRIV0298
PRIV0502	PRIV5652	PRIV0297	PRIV0494	PRIV0496	PRIV0497



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PRIV0498	PRIV0499	PRIV0555	PRIV0551	PRIV0553	PRIV5649
PRIV5650	PRIV0296	PRIV0493	PRIV9672	PRIV9685	PRIV4890
PRIV0277	PRIV5637	PRIV9661	PRIV9664	PRIV9667	PRIV9660

Attachment B to this letter are the entries on the City's privilege log for the above items.

With respect to a number of other documents identified on the privilege log where common interest privilege is asserted there is insufficient detail for UAW to determine whether the privilege is properly invoked. With respect to the following, no attorney is identified in connection with the document:

PRIV0020	PRIV3012	PRIV4334	PRIV7284	PRIV8416
PRIV0081	PRIV3084	PRIV4335	PRIV7287	PRIV8417
PRIV0086	PRIV3118	PRIV4336	PRIV7289	PRIV8418
PRIV0093	PRIV3142	PRIV4338	PRIV7516	PRIV8419
PRIV0224	PRIV3144	PRIV4403	PRIV7523	PRIV8420
PRIV0458	PRIV3165	PRIV4406	PRIV7524	PRIV8450
PRIV0732	PRIV3185	PRIV4407	PRIV7525	PRIV8530
PRIV0979	PRIV3208	PRIV4423	PRIV7540	PRIV8531
PRIV0980	PRIV3210	PRIV4424	PRIV7566	PRIV8532
PRIV0981	PRIV3211	PRIV4427	PRIV7567	PRIV8542
PRIV10423	PRIV3236	PRIV4461	PRIV7569	PRIV8543
PRIV10635	PRIV3276	PRIV4490	PRIV7674	PRIV8544
PRIV10636	PRIV3332	PRIV6275	PRIV7679	PRIV8567
PRIV10637	PRIV3333	PRIV6483	PRIV7813	PRIV8636
PRIV10730	PRIV3368	PRIV6569	PRIV7814	PRIV8647
PRIV10767	PRIV3415	PRIV6601	PRIV8005	PRIV8664
PRIV10800	PRIV3428	PRIV6645	PRIV8006	PRIV8664
PRIV10801	PRIV3460	PRIV7121	PRIV8152	PRIV8666
PRIV10802	PRIV3602	PRIV7165	PRIV8153	PRIV8667
PRIV10803	PRIV3765	PRIV7173	PRIV8220	PRIV8668
PRIV10804	PRIV3795	PRIV7221	PRIV8223	PRIV8694
PRIV10805	PRIV3798	PRIV7228	PRIV8390	PRIV8695
PRIV10848	PRIV3979	PRIV7234	PRIV8391	PRIV8696
PRIV1351	PRIV3981	PRIV7242	PRIV8393	PRIV8713
PRIV1527	PRIV3991	PRIV7247	PRIV8405	PRIV8823
PRIV2315	PRIV4022	PRIV7248	PRIV8406	PRIV8825
PRIV2316	PRIV4066	PRIV7253	PRIV8407	PRIV8826
PRIV2317	PRIV4079	PRIV7260	PRIV8411	PRIV8890
PRIV2744	PRIV4183	PRIV7267	PRIV8412	PRIV8894
PRIV2750	PRIV4230	PRIV7268	PRIV8413	PRIV8900
PRIV2944	PRIV4233	PRIV7274	PRIV8414	PRIV8901
PRIV2982	PRIV4266	PRIV7283	PRIV8415	PRIV8902



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PRIV8903	PRIV8905	PRIV8907	PRIV9018	PRIV9442
PRIV8904	PRIV8906	PRIV8932	PRIV9355	

Attachment C to this letter are the entries on the City's privilege log for the above items.

With respect to the following documents no source or recipient of the document is identified:

PRIV0088	PRIV10627	PRIV8637
PRIV0089	PRIV10628	PRIV8639
PRIV0090	PRIV10631	PRIV8648
PRIV0094	PRIV10632	PRIV8650
PRIV0094	PRIV1955	PRIV8699
PRIV0450	PRIV2697	PRIV8700
PRIV0451	PRIV2698	PRIV8785
PRIV0484	PRIV3060	PRIV8824
PRIV10454	PRIV3401	PRIV8895
PRIV10500	PRIV3417	PRIV8954
PRIV10509	PRIV4416	PRIV8955
PRIV10510	PRIV5371	PRIV9443
PRIV10518	PRIV5372	PRIV9733
PRIV10519	PRIV6131	PRIV9750
PRIV10523	PRIV6139	
PRIV10524	PRIV6232	
PRIV10526	PRIV6315	
PRIV10527	PRIV6390	
PRIV10545	PRIV6984	
PRIV10546	PRIV7148	
PRIV10553	PRIV7225	
PRIV10554	PRIV7505	
PRIV10563	PRIV7571	
PRIV10564	PRIV7602	
PRIV10566	PRIV7680	
PRIV10567	PRIV8008	
PRIV10597	PRIV8339	
PRIV10598	PRIV8399	
PRIV10599	PRIV8431	
PRIV10600	PRIV8432	
PRIV10612	PRIV8433	
PRIV10613	PRIV8534	
PRIV10614	PRIV8535	
PRIV10625	PRIV8537	
PRIV10626	PRIV8538	



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Attachment D to this letter are the entries on the City's privilege log for the above items. In some of these cases the document description notes that it discusses or contains a privileged communication but it does not identify the participants in that communication. In such cases we would ask that the attorney involved be identified and the documents be produced redacting the material the City contends is privileged.

Our review of the privilege log has been complicated by the fact that while the City has produced a number of documents with redactions, it has not cross referenced the Bates number on the production to the item numbers on the privilege log. Thus, it is not clear (in many cases) the bases for the redaction. Please provide us with a log with the necessary cross-references.

I look forward to reviewing your response.

Very truly yours,



Thomas N. Ciantra

TNC:vlf  
Enclosures



# EXHIBIT A

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV0349	3/29/2012	Marcero, Laura	Buckfire, Kenneth; Herman, Kyle; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Sawyer, Hugh		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV0405	3/3/2012	Lennox, Heather* Lennox, Heather*	Dillon, Andy	Ball, Corinne*; Sawyer, Hugh; Ellman, Jeffrey*; Buckfire, Kenneth; Herman, Kyle; Marcero, Laura; Marken, Sanjay; Stibitz, Brom; Erickson, Stuart; Kates, David*; Wilson, Thomas*		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0484	2/18/2013					Attorney Client Work Product Common Interest (Joint Defense)	Draft Memorandum Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Pre-Petition Litigation Issues.	No	Attachment
PRIV0565	5/14/2012	Ellman, Jeffrey*	Sawyer, Hugh	Lennox, Heather*	Seidman, Jennifer*	Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	Yes	Parent
PRIV10482	3/8/2012	Brown, Chris	Sarna, Shavi	Cheryl Johnson, Gaurav.malhotra@ey.com		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Restructuring Issues.	No	
PRIV10483	12/15/2011	Brown, Chris	Cheryl Johnson, Denise Gardner	Jermeycic, Daniel		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Contract Issues.	No	Parent
PRIV10509	8/8/2012					Attorney Client Common Interest (Joint Defense)	Draft Filing Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Attachment
PRIV10544	6/1/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Parent

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV10556	5/16/2012					Attorney Client Common Interest (Joint Defense)	Draft Memorandum Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Attachment
PRIV10557	5/16/2012					Attorney Client Common Interest (Joint Defense)	Draft Memorandum Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Attachment
PRIV10568	3/29/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV10592	3/28/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Parent
PRIV10606	3/26/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Parent
PRIV10621	3/23/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Parent
PRIV10629	3/21/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Solvency Issues.	No	Parent
PRIV10645	3/5/2012	Bowman, Barbara*	Saxton, Thomas			Attorney Client Common Interest (Joint Defense)	Email Providing Confidential Legal Advice And Reflecting Common Legal Interest Re: Solvency Issues.	No	Parent
PRIV2930	6/2/2005	Crumpler, Donita Moore, Charles	Bowen, Glenn; Warren, Karherine	Miller, Evan*; Griffin Heck, Sarah*; Green, Saul*		Work Product	Spreadsheet Prepared in Anticipation of Litigation Re: Employee Pension Fund Obligation Issues.	No	Attachment
PRIV2931	6/30/2006	Moore, Charles	Bowen, Glenn; Warren, Karherine	Miller, Evan*; Griffin Heck, Sarah*; Green, Saul*		Work Product	Report Prepared in Anticipation of Litigation Re: Employee Pension Fund Obligation Issues.	Yes	Attachment

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV3401	3/14/2013					Attorney Client Work Product Common Interest (Joint Defense)	Draft Notes Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Byra, Michelle* And Reflecting Common Legal Interest Re: Pre-Petition Litigation Issues. Appointment of Kevyn Orr as EM	No	Attachment
PRIV7219	5/11/2012	Crittendon, Krystal*	Snyder, Rick			Attorney Client Common Interest (Joint Defense)	Letter Reflecting Confidential Attorney-Client Communications with Crittendon, Krystal* And Reflecting Common Legal Interest Re: Legislative Issues	No	Attachment
PRIV7220	5/16/2012	Dillon, Andy	Crittendon, Krystal*			Attorney Client Common Interest (Joint Defense)	Letter Reflecting Confidential Attorney-Client Communications with Crittendon, Krystal* And Reflecting Common Legal Interest Re: Legislative Issues	No	Attachment
PRIV7232	5/16/2012	Dillon, Andy	Crittendon, Krystal*			Attorney Client Common Interest (Joint Defense)	Letter Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV7242	3/25/2012	Dembowski, Christopher	State of Michigan; City of Detroit			Attorney Client Work Product Common Interest (Joint Defense)	Draft Memorandum Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* Re: Tax Issues.	No	Parent
PRIV7268	3/27/2012		State of Michigan; City of Detroit			Attorney Client Common Interest (Joint Defense)	Draft Memorandum Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Tax Issues.	No	Parent
PRIV7273	6/27/2012		State of Michigan; City of Detroit			Attorney Client Common Interest (Joint Defense)	Draft Memorandum Prepared in the Course of Litigation Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Tax Issues.	No	Parent

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV7274	3/28/2012		State of Michigan; City of Detroit			Attorney Client Work Product Common Interest (Joint Defense)	Draft Memorandum Prepared in the Course of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* Re: Tax Issues.	No	Parent
PRIV7280	6/27/2012		State of Michigan; City of Detroit			Attorney Client Work Product Common Interest (Joint Defense)	Draft Memorandum Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* Re: Tax Issues.	No	Parent
PRIV7283	3/26/2012		State of Michigan; City of Detroit			Attorney Client Work Product Common Interest (Joint Defense)	Draft Memorandum Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* Re: Tax Issues.	No	Parent
PRIV7284	3/25/2012	BPWOODRUFF	State of Michigan; City of Detroit			Attorney Client Work Product Common Interest (Joint Defense)	Draft Memorandum Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* Re: Tax Issues.	No	Parent
PRIV7287	3/25/2012	BPWOODRUFF	State of Michigan; City of Detroit			Attorney Client Common Interest (Joint Defense)	Memorandum Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Tax Issues.	No	Parent
PRIV7289	5/18/2012		State of Michigan; City of Detroit			Attorney Client Common Interest (Joint Defense)	Memorandum Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Tax Issues.	No	Parent
PRIV7571	1/13/2013					Attorney Client Common Interest (Joint Defense)	Draft Report Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV7596	2/19/2013	Dillon, Andy; Burks, Darrell; Goldsberry, Ronald; Headen, Frederick*; McTavish, Thomas; Whipple, Kenneth	Snyder, Rick	Bing, David; Detroit City Councilmen; Bolger, James; Richardville, Randy		Attorney Client Common Interest (Joint Defense)	Memorandum Reflecting Confidential Attorney-Client Communications with Headen, Frederick* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8784	1/14/2013	Andrews, Kriss	Gannon, Chris; Brown, Wendy; Satchel, Lamont; Arya, Vishal; Herman, Kyle; McGee, Michael*; Taranto, Suzanne	Moore, Charles; Andrews, Kriss; Aquart, Patrick; Martin, Jack; Malhotra, Gaurav*; Buckfire, Kenneth; Saxton, Thomas		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Employee Healthcare Obligation Issues.	No	Parent
PRIV8823	12/31/2012	Dillon, Andy	Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8824	12/31/2012					Attorney Client Work Product Common Interest (Joint Defense)	Draft Report Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Attachment
PRIV8825	12/29/2012	Moore, Charles	Dillon, Andy			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Employee Healthcare Obligation Issues.	No	Parent
PRIV8826	12/28/2012	Dillon, Andy	Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Requesting Legal Advice And Reflecting Common Legal Interest Re: Employee Healthcare Obligation Issues.	No	Parent
PRIV8841	12/23/2012	Dillon, Andy	Saxton, Thomas; Stibitz, Brom; Headen, Frederick*; Moore, Charles; Whipple, Kenneth; Pierce, Sandra; Baird, Richard			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV8898	12/12/2012	Doak, James*	Dillon, Andy; Sexton, Thomas; Stibitz, Brom; Andrews, Kriss; Malhotra, Gaurav*; Conway, Van; Moore, Charles	Buckfire, Kenneth; Erickson, Stuart; Herman, Kyle		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8900	12/12/2012	Dillon, Andy	Moore, Charles	Hichez, Amy		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8901	12/12/2012	Dillon, Andy	Moore, Charles	Hichez, Amy		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8902	12/12/2012	Hichez, Amy	Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8903	12/12/2012	Moore, Charles	Hichez, Amy			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8904	12/12/2012	Hichez, Amy	Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8905	12/12/2012	Moore, Charles	Dillon, Andy	Hichez, Amy		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8906	12/12/2012	Dillon, Andy	Moore, Charles	Hichez, Amy		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV8910	12/10/2012	Dillon, Andy	Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8923	12/10/2012	Dillon, Andy	Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8924	12/10/2012	Moore, Charles	Dillon, Andy	Stibitz, Brom; Saxton, Thomas; Spillane, Thomas*		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8925	12/10/2012	Hand, Kevin	Gannon, Chris; Moore, Charles			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8926	12/10/2012	Gannon, Chris	Moore, Charles; Hand, Kevin			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV8931	12/9/2012	Dillon, Andy	Stibitz, Brom; Saxton, Thomas; Moore, Charles; Spillane, Thomas*			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* And Reflecting Common Legal Interest Re: Restructuring Issues.	Yes	Parent
PRIV9732	6/5/2012					Attorney Client Common Interest (Joint Defense)	Memorandum Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Restructuring Issues.	Yes	Attachment
PRIV9733	6/5/2012					Attorney Client Common Interest (Joint Defense)	Memorandum Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Labor Negotiation Contract Issues.	Yes	Attachment

## Privilege log sorted for Common Interest entries prior to 3/15/13

Privlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV9749	3/2/2012	Sawyer, Hugh	Ellman, Jeffrey*; Buckfire, Kenneth	Lennox, Heather*; Ball, Corinne*; Wilson, Thomas*; Herman, Kyle; Erickson, Stuart; Marcero, Laura		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Contract Issues.	No	Parent
PRIV9830	3/5/2012	Wilson, Thomas*	Dillon, Andy; Ball, Corinne*; Kates, David*; Lennox, Heather*; Sawyer, Hugh; Buckfire, Kenneth; Herman, Kyle; Marken, Sanjay; Erickson, Stuart; Ellman, Jeffrey*; Stibitz, Brom			Attorney Client Common Interest (Joint Defense)	Email Providing Confidential Legal Advice And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV4959	3/14/2013	Satchel, Lamont	Keelean, Edward*; Stibitz, Brom			Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Labor Negotiation Issues.	No	Parent

# EXHIBIT B

Prvlog ID	Date	Author	Recipient	CC	BCC	Privilege Asserted	Privilege Description	Redaction	Doc Type
PRIV2930	6/2/2005	Crumpler, Donita Moore, Charles	Bowen, Glenn; Warren, Karherine	Miller, Evan*; Griffin Heck, Sarah*; Green, Saul*		Work Product	Spreadsheet Prepared in Anticipation of Litigation Re: Employee Pension Fund Obligation Issues.	No	Attachment
PRIV2931	6/30/2006	Moore, Charles	Bowen, Glenn; Warren, Karherine	Miller, Evan*; Griffin Heck, Sarah*; Green, Saul*		Work Product	Report Prepared in Anticipation of Litigation Re: Employee Pension Fund Obligation Issues.	Yes	Attachment
PRIV5630	3/6/2011	Kates, David*	Lennox, Heather*; Wilson, Thomas*; Ellman, Jeffrey*; Ball, Corinne*	Rudd, Megan*		Work Product	Email Prepared in Anticipation of Litigation Re: Pre-Petition Litigation Issues.	Yes	Attachment
PRIV0414	1/6/2012	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Wilson, Thomas*	Shumaker, Michael*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	Yes	Parent
PRIV0411	2/29/2012	Buckfire, Kenneth	Ball, Corinne*; Lennox, Heather*	Sawyer, Hugh; Erickson, Stuart; Herman, Kyle; Marken, Sanjay		Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0408	3/1/2012	Herman, Kyle	Wilson, Thomas*; Lennox, Heather*; Ellman, Jeffrey*; Ball, Corinne*	Marken, Sanjay; Buckfire, Kenneth; Erickson, Stuart		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0407	3/2/2012	Ellman, Jeffrey*	Ball, Corinne*	Lennox, Heather*; Wilson, Thomas*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV9749	3/2/2012	Sawyer, Hugh	Ellman, Jeffrey*; Buckfire, Kenneth	Lennox, Heather*; Ball, Corinne*; Wilson, Thomas*; Herman, Kyle; Erickson, Stuart; Marcero, Laura		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Contract Issues.	No	Parent

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PRIV0405	3/3/2012	Lennox, Heather* Lennox, Heather*	Dillon, Andy	Ball, Corinne*; Sawyer, Hugh; Ellman, Jeffrey*; Buckfire, Kenneth; Herman, Kyle; Marcero, Laura; Marken, Sanjay; Stibitz, Brom; Erickson, Stuart; Kates, David*; Wilson, Thomas*		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0399	3/6/2012	Kates, David*	Lennox, Heather*; Wilson, Thomas*; Ellman, Jeffrey*; Ball, Corinne*	Rudd, Megan*		Attorney Client	Memorandum Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Contract Issues.	No	Parent
PRIV0400	3/6/2012	Wilson, Thomas*	Sawyer, Hugh	Ball, Corinne*; Kates, David*; Lennox, Heather*; Ellman, Jeffrey*; Buckfire, Kenneth; Herman, Kyle; Marcero, Laura; Marken, Sanjay; Erickson, Stuart		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0397	3/7/2012	Kates, David*	Lennox, Heather*	Ball, Corinne*; Ellman, Jeffrey*; Rudd, Megan*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Contract Issues.	No	Parent
PRIV0398	3/7/2012	Lennox, Heather*	Sawyer, Hugh	Ball, Corinne*; Kates, David*; Ellman, Jeffrey*; Buckfire, Kenneth; Herman, Kyle; Marcero, Laura; Marken, Sanjay; Erickson, Stuart; Wilson, Thomas*		Attorney Client	Email Providing Confidential Legal Advice Re: Restructuring Issues.	No	Parent
PRIV0395	3/10/2012	Sawyer, Hugh	Ball, Corinne*; Ellman, Jeffrey*	Kates, David*; Lennox, Heather*; Buckfire, Kenneth; Herman, Kyle; Marcero, Laura; Marken, Sanjay; Erickson, Stuart; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent

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PRIV9745	3/11/2012	Sawyer, Hugh	Ball, Corinne*; Ellman, Jeffrey*	Kates, David*; Lennox, Heather*; Buckfire, Kenneth; Herman, Kyle; Marcero, Laura; Marken, Sanjay; Erickson, Stuart; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0394	3/13/2012	Sawyer, Hugh	Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	jdidonato@huronconsultinggroup.com		Attorney Client	Email Requesting Legal Advice Re: Restructuring Issues.	No	Parent
PRIV0386	3/16/2012	Ball, Corinne*	Lennox, Heather*; Kates, David*; Wilson, Thomas*	Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0388	3/16/2012	Buckfire, Kenneth	Sawyer, Hugh; Marcero, Laura; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Erickson, Stuart; Herman, Kyle; Marken, Sanjay		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0378	3/21/2012	Ellman, Jeffrey*	Marcero, Laura	Buckfire, Kenneth; Sawyer, Hugh; Herman, Kyle; Ball, Corinne*; Lennox, Heather*; Wilson, Thomas*; Kates, David*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0380	3/21/2012	Marcero, Laura	Herman, Kyle; Buckfire, Kenneth; Sawyer, Hugh; Ellman, Jeffrey*; Kates, David*; Lennox, Heather*; Ball, Corinne*	Wilson, Thomas*; Marken, Sanjay		Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0381	3/21/2012	Ellman, Jeffrey*	Herman, Kyle	Ball, Corinne*; Kates, David*; Lennox, Heather*; Sawyer, Hugh; Buckfire, Kenneth; Marcero, Laura; Marken, Sanjay; Wilson, Thomas*		Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent

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PRIV0382	3/21/2012	Herman, Kyle	Buckfire, Kenneth; Sawyer, Hugh; Ellman, Jeffrey*; Kates, David*; Lennox, Heather*; Ball, Corinne*	Wilson, Thomas*; Marcero, Laura; Marken, Sanjay		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0383	3/21/2012	Sawyer, Hugh	Buckfire, Kenneth; Ball, Corinne*; Lennox, Heather*; Herman, Kyle; Erickson, Stuart; Ellman, Jeffrey*	Marcero, Laura		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent
PRIV9742	3/21/2012	Sawyer, Hugh	Buckfire, Kenneth; Ball, Corinne*; Lennox, Heather*; Herman, Kyle; Erickson, Stuart; Ellman, Jeffrey*	Marcero, Laura		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0375	3/22/2012	Marcero, Laura	Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Buckfire, Kenneth; Herman, Kyle; Sawyer, Hugh		Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications Re: Labor Negotiation Contract Issues.	No	Parent
PRIV0376	3/22/2012	Marcero, Laura	Buckfire, Kenneth; Herman, Kyle; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Sawyer, Hugh		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing issues.	No	Parent
PRIV0377	3/22/2012	Ellman, Jeffrey* Ellman, Jeffrey*	Herman, Kyle; Marcero, Laura	Buckfire, Kenneth; Sawyer, Hugh; Ball, Corinne*; Lennox, Heather*; Wilson, Thomas*; Kates, David*; Erickson, Stuart; Marken, Sanjay		Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0373	3/23/2012	Marcero, Laura	Buckfire, Kenneth; Herman, Kyle; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Sawyer, Hugh		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent

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PRIV9739	3/23/2012	Marcero, Laura	Ellman, Jeffrey*	Herman, Kyle; Ball, Corinne*; Lennox, Heather*; Sawyer, Hugh; Buckfire, Kenneth; Wilson, Thomas*; Kates, David*; Marken, Sanjay; Erickson, Stuart		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV9740	3/23/2012	Marcero, Laura	Herman, Kyle	Ellman, Jeffrey*; Marken, Sanjay		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0369	3/24/2012	Herman, Kyle	Ellman, Jeffrey*; Marcero, Laura	Ball, Corinne*; Lennox, Heather*; Sawyer, Hugh; Buckfire, Kenneth; Marken, Sanjay; Wilson, Thomas*; Erickson, Stuart		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0370	3/24/2012	Ellman, Jeffrey*	Marcero, Laura	Ball, Corinne*; Lennox, Heather*; Sawyer, Hugh; Buckfire, Kenneth; Herman, Kyle; Marken, Sanjay; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0371	3/24/2012	Marcero, Laura	Buckfire, Kenneth; Herman, Kyle; Marken, Sanjay; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Sawyer, Hugh		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0372	3/24/2012	Ellman, Jeffrey*	Herman, Kyle	Lennox, Heather*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV9738	3/24/2012	Ellman, Jeffrey* Ellman, Jeffrey*	Marcero, Laura	Ball, Corinne*; Lennox, Heather*; Sawyer, Hugh; Buckfire, Kenneth; Herman, Kyle; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Solvency Issues.	No	Parent

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PRIV0359	3/25/2012	Marcero, Laura	Buckfire, Kenneth; Herman, Kyle; Marken, Sanjay; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Sawyer, Hugh		Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0348	3/29/2012	Ellman, Jeffrey*	Marcero, Laura; Buckfire, Kenneth; Herman, Kyle; Ball, Corinne*; Lennox, Heather*	Sawyer, Hugh; Wilson, Thomas*		Attorney Client	Email Requesting Legal Advice Re: Labor Negotiation Contract Issues.	No	Parent
PRIV0349	3/29/2012	Marcero, Laura	Buckfire, Kenneth; Herman, Kyle; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Sawyer, Hugh		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Restructuring Issues.	No	Parent
PRIV0565	5/14/2012	Ellman, Jeffrey*	Sawyer, Hugh	Lennox, Heather*	Seidman, Jennifer*	Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing Issues.	Yes	Parent
PRIV0566	5/14/2012	Ellman, Jeffrey*	Seidman, Jennifer*	Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	Yes	Parent
PRIV0344	5/15/2012	Sawyer, Hugh	Ellman, Jeffrey*	Lennox, Heather*		Attorney Client	Email Providing Confidential Legal Advice Re: Restructuring Issues.	Yes	Parent
PRIV0342	5/16/2012	Sawyer, Hugh	Buckfire, Kenneth; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Erickson, Stuart; Herman, Kyle; Marcero, Laura; jdidonato@huronconsultinggroup.com		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0335	5/20/2012	Ellman, Jeffrey*	Lennox, Heather*	Killion, Donna		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0340	5/20/2012	Sawyer, Hugh	Buckfire, Kenneth; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*	Herman, Kyle; Erickson, Stuart; Marcero, Laura		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent

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PRIV0339	6/5/2012	Herman, Kyle	Buckfire, Kenneth; Lennox, Heather*	Marken, Sanjay; Erickson, Stuart		Attorney Client Work Product	Email Prepared in the Course of Litigation Reflecting Confidential Attorney-Client Communications Re: Legislative Issues	No	Parent
PRIV9731	6/5/2012	Wilson, Thomas*	Lennox, Heather*	Ball, Corinne; Ellman, Jeffrey*		Attorney Client Common Interest (Joint Defense)	Email Reflecting Confidential Attorney-Client Communications And Reflecting Common Legal Interest Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0333	6/20/2012	Ellman, Jeffrey*	Lennox, Heather*	Killion, Donna		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV5755	6/30/2012	Reil, Mary*	Griffin Heck, Sarah*	Miller, Evan*		Work Product	Notes Prepared in Anticipation of Litigation Re: Employee Pension Fund Obligation Issues.	No	Attachment
PRIV5968	6/30/2012	Reil, Mary*	Griffin Heck, Sarah*	Miller, Evan*		Work Product	Notes Prepared in Anticipation of Litigation Re: Employee Pension Fund Obligation Issues.	No	Attachment
PRIV9726	11/7/2012	Tiller, Joseph*	Kates, David*	Ellman, Jeffrey*; Lennox, Heather*; Wilson, Thomas*		Attorney Client	Email Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing issues.	No	Parent
PRIV0321	12/7/2012	Ellman, Jeffrey*	Ball, Corinne*	Lennox, Heather*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Chapter 9 Bankruptcy Filing issues.	No	Parent
PRIV0322	12/7/2012	Ellman, Jeffrey*	Ball, Corinne*	Lennox, Heather*; Wilson, Thomas*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Providing Confidential Legal Advice Re: Chapter 9 Bankruptcy Filing issues.	No	Parent
PRIV9719	12/7/2012	Ellman, Jeffrey*	Ball, Corinne*	Lennox, Heather*; Wilson, Thomas*	Ellman, Jeffrey*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV9720	12/7/2012	Ellman, Jeffrey*	Ball, Corinne*	Lennox, Heather*; Wilson, Thomas*	Ellman, Jeffrey*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent

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PRIV5698	1/9/2013	Merrett, Daniel*	Ellman, Jeffrey*	Griffin Heck, Sarah*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV5710	1/9/2013	Miller, Evan*	Ellman, Jeffrey*	Ferber, Amy Edgy*; Bennett, Bruce*; Ball, Corinne*; Kates, David*; Lennox, Heather*; Wilson, Thomas*; Griffin Heck, Sarah*		Attorney Client Work Product	Email Prepared in the Course of Litigation Reflecting Confidential Attorney-Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV0267	1/15/2013	FirstSouthwest Moore, Charles	Lennox, Heather*	Malhotra, Gaurav*; Ellman, Jeffrey*		Attorney Client	Report Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Attachment
PRIV0523	1/15/2013	Ellman, Jeffrey*	Ball, Corinne*	Bennett, Bruce*; Lennox, Heather*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Public Relations Issues.	No	Parent
PRIV0524	1/15/2013	Ball, Corinne*	Ellman, Jeffrey*	Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Public Relations Issues.	No	Parent
PRIV5662	1/15/2013	Griffin Heck, Sarah*	Miller, Evan*	Ball, Corinne*	Griffin Heck, Sarah*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV5663	1/15/2013	Griffin Heck, Sarah* Griffin Heck, Sarah*	Ball, Corinne*	Miller, Evan*; Ellman, Jeffrey*	Griffin Heck, Sarah*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Employee Healthcare Obligation Issues.	No	Parent
PRIV5664	1/15/2013	Griffin Heck, Sarah*	Ellman, Jeffrey*	Ball, Corinne*; Miller, Evan*	Griffin Heck, Sarah*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV5665	1/15/2013	Griffin Heck, Sarah*	Eaton, Miguel*	Miller, Evan*	Griffin Heck, Sarah*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent

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PRIV0308	1/17/2013	Elman, Jeffrey*	Elman, Jeffrey*	Agenbroad, Aaron*; Bennett, Bruce*; Ball, Corinne*; Kates, David*; Miller, Evan*; Lennox, Heather*; Orr, Kevyn; Griffin Heck, Sarah*; Wilson, Thomas*		Attorney Client	Memorandum Reflecting Confidential Attorney-Client Communications Re: Contract Issues.	Yes	Parent
PRIV0310	1/17/2013	Elman, Jeffrey*	Lennox, Heather*; Ball, Corinne*; Orr, Kevyn; Bennett, Bruce*	Miller, Evan*; Griffin Heck, Sarah*; Agenbroad, Aaron*; Kates, David*; Wilson, Thomas*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications Re: Contract Issues.	No	Parent
PRIV5668	1/17/2013	Griffin Heck, Sarah*	Elman, Jeffrey*	Miller, Evan*	Griffin Heck, Sarah*	Attorney Client Work Product	Email Prepared in Anticipation of Litigation Providing Confidential Legal Advice Re: Pre-Petition Litigation Issues.	No	Parent
PRIV5660	1/17/2013	Griffin Heck, Sarah*	Miller, Evan*	Elman, Jeffrey*; Small, Kristie	Griffin Heck, Sarah*	Attorney Client Work Product	Email Prepared in Anticipation of Litigation Providing Confidential Legal Advice Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0521	1/18/2013	Ball, Corinne*	Shumaker, Gregory*; Reidy, Daniel*; Thomas, Lizanne*; Johnson, Wesley*; Kessler, Elizabeth*; Agenbroad, Aaron*; Lovrien, Christopher*	DiNardo, Lawrence*; Miller, Evan*; Leake, Paul*; Deane, Richard*; Pohl, Paul*; Nager, Glen*; Tambe, Jayant*; Barragate, Brett*	Orr, Kevyn	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Solvency Issues.	Yes	Parent
PRIV0519	1/19/2013	Ball, Corinne*	Brogan, Stephen*	Elman, Jeffrey*; Lennox, Heather*; Orr, Kevyn; Agenbroad, Aaron*; Miller, Evan*; Bennett, Bruce*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent

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PRIV0520	1/19/2013	Buckfire, Kenneth	Ball, Corinne*	Brogan, Stephen*; Agenbroad, Aaron*; Bennett, Bruce*; Lennox, Heather*; Orr, Kevyn; Martin, Jack; Dillon, Andy; Baird, Richard; Stibitz, Brom; Saxton, Thomas		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0517	1/20/2013	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Orr, Kevyn; Bennett, Bruce*	Agenbroad, Aaron*; Miller, Evan*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0505	1/22/2013	Lennox, Heather* Lennox, Heather*	Bennett, Bruce*	Ball, Corinne*; Johnston, James*; Ellman, Jeffrey*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Restructuring Issues.	No	Parent
PRIV0506	1/22/2013	Jones Day Lennox, Heather*	Bennett, Bruce*	Ball, Corinne*; Johnston, James*; Ellman, Jeffrey*; Orr, Kevyn		Attorney Client Work Product Common Interest (Joint Defense)	Draft Outline Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Jones Day* And Reflecting Common Legal Interest Re: Pre-Petition Litigation Issues.	No	Attachment
PRIV0507	1/22/2013	Ellman, Jeffrey*	Lennox, Heather*; Bennett, Bruce*	Ball, Corinne*; Johnston, James*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0508	1/22/2013	Lennox, Heather*	Bennett, Bruce*	Ball, Corinne*; Johnston, James*; Ellman, Jeffrey*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0509	1/22/2013	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Orr, Kevyn; Bennett, Bruce*	Kates, David*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0511	1/22/2013	Ellman, Jeffrey* Ellman, Jeffrey*	Ball, Corinne*	Bennett, Bruce*; Lennox, Heather*; Johnston, James*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent

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PRIV0512	1/22/2013	Lennox, Heather* Lennox, Heather*	Ellman, Jeffrey*	Bennett, Bruce*; Ball, Corinne*; Johnston, James*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0513	1/22/2013	Bennett, Bruce*	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Johnston, James*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0514	1/22/2013	Ellman, Jeffrey* Ellman, Jeffrey*	Bennett, Bruce*	Ball, Corinne*; Lennox, Heather*; Johnston, James*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV6656	1/22/2013	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Miller, Evan*; Griffin Heck, Sarah*; Kates, David*	Moss, Daniel*; Wilson, Thomas*		Work Product	Email Prepared in Anticipation of Litigation Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0301	1/24/2013	JonesDay* Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0302	1/24/2013	JonesDay* Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*		Work Product	Outline Prepared in Anticipation of Litigation Re: Chapter 9 Bankruptcy Filing Issues.	No	Attachment
PRIV0303	1/24/2013	JonesDay* Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*		Work Product	Draft Outline Prepared in Anticipation of Litigation Re: Chapter 9 Bankruptcy Filing Issues.	No	Attachment

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PRIV0304	1/24/2013	JonesDay* Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*		Work Product	Memorandum Prepared in Anticipation of Litigation Re: Chapter 9 Bankruptcy Filing Issues.	Yes	Attachment
PRIV0305	1/24/2013	JonesDay* Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*		Work Product	Outline Prepared in Anticipation of Litigation Re: Chapter 9 Bankruptcy Filing Issues.	No	Attachment
PRIV0306	1/24/2013	JonesDay* Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*		Work Product	Outline Prepared in Anticipation of Litigation Re: Chapter 9 Bankruptcy Filing Issues.	No	Attachment
PRIV0307	1/24/2013	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*	Wilson, Thomas*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Regulatory Issues.	No	Parent
PRIV9692	1/24/2013	Ellman, Jeffrey*	Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Agenbroad, Aaron*; Griffin Heck, Sarah*; Miller, Evan*; Kates, David*	Wilson, Thomas*	Ellman, Jeffrey*; Merrett, Daniel*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Restructuring Issues.	No	Parent
PRIV0298	1/25/2013	Ellman, Jeffrey*	Orr, Kevyn; Ball, Corinne*; Lennox, Heather*; Agenbroad, Aaron*; Bennett, Bruce*	Merrett, Daniel*		Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent

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PRIV0502	1/25/2013	Ellman, Jeffrey*	Agenbroad, Aaron*; Ball, Corinne*; Lennox, Heather*; Bennett, Bruce*; Orr, Kevyn; Miller, Evan*; Kates, David*; Griffin Heck, Sarah*	Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Solvency Issues.	No	Parent
PRIV5652	1/25/2013	Griffin Heck, Sarah*	Miller, Evan*	Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV0297	1/28/2013	Ball, Corinne*	Ellman, Jeffrey*	Agenbroad, Aaron*; Bennett, Bruce*; Kates, David*; Miller, Evan*; Lennox, Heather*; Orr, Kevyn; Griffin Heck, Sarah*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0494	1/28/2013	Ellman, Jeffrey*	Ferber, Amy Edgy*	Bennett, Bruce*; Ball, Corinne*; Lennox, Heather*; Orr, Kevyn		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Public Relations Issues.	No	Parent
PRIV0496	1/28/2013	Bennett, Bruce*	Ball, Corinne*	Agenbroad, Aaron*; Kates, David*; Miller, Evan*; Lennox, Heather*; Ellman, Jeffrey*; Orr, Kevyn; Griffin Heck, Sarah*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0497	1/28/2013	Lennox, Heather*	Bennett, Bruce*	Agenbroad, Aaron*; Ball, Corinne*; Miller, Evan*; Ellman, Jeffrey*; Orr, Kevyn; Griffin Heck, Sarah*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV0498	1/28/2013	Bennett, Bruce*	Miller, Evan*	Agenbroad, Aaron*; Ball, Corinne*; Lennox, Heather*; Ellman, Jeffrey*; Orr, Kevyn; Griffin Heck, Sarah*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent

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Initial priv log sorted and filtered for Jones Day attorneys prior to 3/11/13

PRIV0499	1/28/2013	Lennox, Heather*	Ellman, Jeffrey*	Agenbroad, Aaron*; Bennett, Bruce*; Ball, Corinne*; Kates, David*; Miller, Evan*; Orr, Kevyn; Griffin Heck, Sarah*; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV0555	1/28/2013	Griffin Heck, Sarah*	Ellman, Jeffrey*	Agenbroad, Aaron*; Bennett, Bruce*; Ball, Corinne*; Kates, David*; Miller, Evan*; Lennox, Heather*; Seidman, Jennifer*; Orr, Kevyn; Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Labor Negotiation Contract Issues.	No	Parent
PRIV0551	1/29/2013	Seidman, Jennifer*	Wilson, Thomas*	Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent
PRIV0553	1/29/2013	Seidman, Jennifer*	Ellman, Jeffrey*	Wilson, Thomas*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Pre-Petition Litigation Issues.	No	Parent
PRIV5649	1/29/2013	Agenbroad, Aaron*	Ellman, Jeffrey*	Bennett, Bruce*; Ball, Corinne*; Lennox, Heather*; Orr, Kevyn; Wilson, Thomas*; Miller, Evan*; Griffin Heck, Sarah*		Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Labor Negotiation Contract Issues.	No	Parent
PRIV5650	1/29/2013	Griffin Heck, Sarah*	Ellman, Jeffrey*	Miller, Evan*	Griffin Heck, Sarah*	Attorney Client	Email Reflecting Confidential Attorney-Client Communications Re: Labor Negotiation Contract Issues.	No	Parent
PRIV0296	1/30/2013	Ferber, Amy Edgy*	Orr, Kevyn; Ball, Corinne*	Agenbroad, Aaron*; Bennett, Bruce*; Miller, Evan*; Lennox, Heather*; Ellman, Jeffrey*; Griffin Heck, Sarah*; Brogan, Stephen*; Wilson, Thomas*		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Jones Day* Re: Contract Issues.	No	Parent

PRIV0493	2/11/2013	Ball, Corinne* Ball, Corinne*	Orr, Kevyn	Lennox, Heather*; Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications with Jones Day* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV9672	2/11/2013	Wilson, Thomas*	Orr, Kevyn; Moss, Daniel*	Ball, Corinne*; Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Restructuring Issues.	Yes	Parent
PRIV9685	2/11/2013	Orr, Kevyn	Ellman, Jeffrey*	Ball, Corinne*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Restructuring Issues.	No	Parent
PRIV4890	2/27/2013	Martin, Jack	Ball, Corinne*	McMurray, Maurice; Keelean, Edward*; Dillon, Andy; Buckfire, Kenneth		Attorney Client Work Product	Email Prepared in Anticipation of Litigation Reflecting Confidential Attorney-Client Communications with Detroit Corporation Counsel* Re: Restructuring Issues.	No	Parent
PRIV0277	3/4/2013	Wilson, Thomas*	Ball, Corinne*	Bennett, Bruce*; Lennox, Heather*; Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications with Detroit Corporation Counsel* Re: Pre-Petition Litigation Issues.	No	Parent
PRIV5637	3/7/2013	Poirier-Whitley, Kirstin*	Miller, Evan*	Griffin Heck, Sarah*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Employee Pension Fund Obligation Issues.	No	Parent
PRIV9661	3/10/2013	Ball, Corinne*	Wilson, Thomas*	Moss, Daniel*; Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Restructuring Issues.	No	Parent
PRIV9664	3/10/2013	Ball, Corinne*	Wilson, Thomas*	Moss, Daniel*; Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Restructuring Issues.	No	Parent
PRIV9667	3/10/2013	Ball, Corinne*	Wilson, Thomas*	Moss, Daniel*; Ellman, Jeffrey*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent
PRIV9660	3/11/2013	Bennett, Bruce*	Ball, Corinne*	Ellman, Jeffrey*; Wilson, Thomas*; Lennox, Heather*		Attorney Client	Email Reflecting Confidential Attorney- Client Communications Re: Chapter 9 Bankruptcy Filing Issues.	No	Parent